

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

VENICE PI, LLC

Plaintiff,

v.

DOES 1-10,

Defendants.

3:17-CV-445

MOTION FOR LEAVE TO TAKE DISCOVERY
PRIOR TO RULE 26(f) CONFERENCE

Plaintiff, by and through undersigned counsel, pursuant to the Federal Rules of Civil Procedure, respectfully moves this Court for leave to take limited discovery prior to the Rule 26(f) conference for the reasons stated in the Memorandum filed contemporaneously herewith.

In particular, Plaintiff seeks the issuance of subpoenas under Rule 45 to one or more Internet Service Providers (“ISPs”) who provided internet services to any of the Doe Defendants identified by an Internet Protocol (“IP”) address in Exhibit 2 of the Complaint. The subpoenas will seek production of documents containing information sufficient to identify each Doe Defendant, including providing their names and current addresses.

Respectfully submitted,

Venice PI, LLC

Dated this 28th day of July, 2017

By: /s/Kathleen M. Lynch
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 28th day of July, 2017, she electronically filed the foregoing “MOTION FOR LEAVE TO TAKE DISCOVERY PRIOR TO RULE 26(f) CONFERENCE” with the Clerk of the Court using the CM/ECF system which will electronically send notification of such filing to all counsel of record or interested parties via the CM/ECF system.

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